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To <Pamela\_Pinson@FMI.com>

cc "Schoeppner, Jerry, NMENV"  
<jerry.schoeppner@state.nm.us>, Mark  
Purcell/R6/USEPA/US@EPA, "Crawford, Diane"

bcc

Subject IRA Completion Report

Hi Pam

I've talked with Mark about the FS and IRA Completion Report and he will be sending me a comment letter for those documents. In an effort to have the IRA Completion report submitted by April 18<sup>th</sup> I thought I would pass along a couple issues. The IRACR (Section 6) should discuss the two threshold criteria in more detail; please provide sections for public protection and ARARs.

1. Public protection: although the text briefly discusses mitigating risk please elaborate by incorporating some HHRA numbers and/or equations. I put this brief tidbit together as an example, "*The Remedial Action Criteria (RAC), supported by the United States Environmental Protection Agency, was based on calculations from the Hurley Human Health Risk Assessment compiled by Gradient Corporation for the NMED. The HHRA determined a hazard quotient (HQ) of 3.5 indicating potential risk to children due to incidental ingestion of copper contaminated soil (Gradient 2000). This HQ was calculated as a reasonable maximum exposure (RME). Upon completion of the IRA soil copper levels are below 5000 mg/kg. Recalculating potential risk, or RME, determined an HQ of 0.7 indicating no risk to children due to incidental soil ingestion.*" We need to demonstrate substantial risk reduction in order to move into and support the "No Further Action" ROD.

2. ARARs: this section warrants more than one brief sentence. Please elaborate on any pertinent ARARs such as disposal of the contaminated soil (hazardous waste) or potential improvement of surface water runoff.

3. An FS generally includes the total cost of an alternative; however, not knowing how many properties needed remediation negated that calculation. Please include the approximate total cost of the IRA in Section 6.

If you, or Diane, have any questions don't hesitate to call or email.

Thanks,  
Phil

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